

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ANNETTE WILLIAMS,)	CIVIL DIVISION
)	
Plaintiff,)	Civil Action No.: 2:21-cv-898
)	
vs.)	<i>Electronically Filed</i>
)	
THE PROGRAM FOR OFFENDERS, INC.,)	
)	JURY TRIAL DEMANDED
Defendant.)	

PETITION FOR REMOVAL FROM A CIVIL ACTION

AND NOW, comes Defendant THE PROGRAM FOR OFFENDERS, INC., by and through its counsel, MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN and ESTELLE K. McGRATH, ESQUIRE, and files the within Petition for Removal of Civil Action from the Court of Common Pleas of Allegheny County, Pennsylvania, to the United States District Court for the Western District of Pennsylvania, representing as follows:

1. Plaintiff filed a Praecipe for Writ of Summons on December 18, 2020, captioned as “Annette Williams v. The Program For Offenders, Inc.” at Docket Number GD-20-012812 in the Court of Common Pleas of Allegheny County, Pennsylvania. A copy of the Praecipe for Writ of Summons is attached hereto and marked as Exhibit “A”.
2. Plaintiff served the Writ on January 11, 2021. A copy of the Allegheny County docket at GD-20-012812 is attached hereto and marked Exhibit “B”.
3. Plaintiff filed a Complaint on June 25, 2021. A copy of the Complaint is attached hereto and marked as Exhibit “C”.

4. This Court has original jurisdiction of Plaintiff's claims pursuant to 28 U.S.C. §1331 and §1343, and the action is thereby removed to this Court pursuant to the procedures authorized by 28 U.S.C. §1441(a).

5. Jurisdiction of this matter lies with this Court, as Plaintiff brings claims alleging retaliation and disability discrimination under the Americans with Disabilities Act (Count One and Count Two), and violations of the ADEA (Count Three), Rehabilitation Act (Count Five) and Title VII (Count Six). *See* Ex. "C" at Count One, Two, Three, Five and Six.

6. Notice of a Filing of Removal has been provided this same date to the Court of Common Pleas. See attached hereto a true and correct copy of the Notice of Filing of Removal marked as Ex. "D".

WHEREFORE, Defendant, The Program for Offenders, Inc., respectfully requests this Honorable Court to remove the above-captioned action pending in the Court of Common Pleas of Allegheny County, Pennsylvania at No. GD-20-012812 to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

**MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN**

BY: s/ Estelle K. McGrath
ESTELLE K. McGRATH, ESQUIRE
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Petition For Removal From A Civil Action* has been served upon the below listed counsel of record via U.S.

First Class mail, postage prepaid, this 13th day of July, 2021, as follows:

David M. Kobylinski, Esquire
Peter T. Kobylinski, Esquire
Praetorian Law Group, LLC
515 Court Place, Suite 4
Pittsburgh, PA 15219
Counsel for Plaintiff

**MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN**

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